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Attorney for Defendant  
VINCE MING WAN

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.

Case No. CR 06-0426 SI

**AMENDED JOINT STIPULATION AND  
[PROPOSED] ORDER TO CONTINUE  
MOTIONS HEARING AND ALTER  
BRIEFING SCHEDULE AND  
EXCLUDE TIME**

VINCE MING WAN, ALEX WAI  
SHING FONG, PHUNG VAN  
NGUYEN, KITTY YEE LI, JAY  
YUAN, MICHAEL YUK LAM  
LEUNG, and EDWIN GORDON  
TOY,

Defendants.

WHEREAS the United States Attorney's Office of the Northern District of California conferred with counsel for Vince Wan, Alex Fong, Michael Leung, and Kitty Li (collectively, the "Parties") regarding scheduling and further attempts to resolve this matter.

WHEREAS, defense motions currently are scheduled to be heard on August 22, 2008 at 11:00 a.m., with defense motions having been due on June 27, 2008, opposition briefs due on July 25, 2008, and reply briefs due on August 12, 2008.

WHEREAS, the Parties wish to continue discussions regarding possible resolution of the case and counsel for the defendants require additional time to complete review of voluminous discovery prior to filing their motions.

1 WHEREAS, the Parties previously stipulated and proposed a new hearing date and  
2 briefing schedule, where counsel for Vince Wan, in error, stipulated to a new hearing date  
3 of September 12, 2008, and counsel for Mr. Wan also having been informed by the Court's  
4 clerk that September 12, 2008, in fact may be unavailable, and the Court's clerk having  
5 advised that the Parties file their request for September 19, 2008,

6 THE PARTIES hereby agree and respectfully request that the motions hearing be  
7 postponed to September 19, 2008, at 11:00 a.m., with defense motions due July 18, 2008,  
8 opposition briefs due August 15, 2008, and reply briefs due September 2, 2008.

9 THE PARTIES FURTHER hereby agree and respectfully request that the period from  
10 June 27, 2008, through September 19<sup>22</sup>, 2008, be excluded from the otherwise applicable  
11 Speedy Trial computation, pursuant to 18 U.S.C. §§ 3161(h)(8)(A) and (B)(ii) and (iv).

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13 IT IS SO STIPULATED

14  
15 Dated: 7/7/08

U.S. ATTORNEY'S OFFICE

16  
17 By /s/ Nicole Kim  
18 NICOLE KIM  
Attorney for Plaintiff  
UNITED STATES OF AMERICA

19  
20 Dated: 7/7/08

LAW OFF OF DOUGLAS I. HORNGRAD

21  
22 By /s/ Douglas I. Horngrad  
DOUGLAS I. HORNGRAD  
23 Attorney for Defendant  
VINCE MING WAN

24  
25 Dated: 7/7/08

MORGAN LEWIS & BOCKIUS LLP

26  
27 By /s/ John H. Hemann  
JOHN H. HEMANN  
28 Attorney for Defendant  
KITTY YEE LI

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1 Dated: 7/7/08

LAW OFFICE OF CLAIRE LEARY

2  
3 By /s/ Claire Margaret Leary  
4 CLAIRE MARGARET LEARY  
5 Attorney for Defendant  
ALEX WAI SHING FONG


6 Dated: 7/7/08

LAW OFFICE OF JULIANA DROUS

7  
8 By /s/ Juliana Drous  
9 JULIANA DROUS  
10 Attorney for Defendant  
MICHAEL YUK LAM LEUNG

11 **IT IS SO ORDERED**

12  
13 Dated: \_\_\_\_\_

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16 **HON. JUDGE SUSAN ILLSTON**  
17 **UNITED STATES DISTRICT COURT**  
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